

SEALED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

MAY 16 2019

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

Plaintiff,

v.

[REDACTED]

CLARISELA BERMEA (5),

also known as "Mom,"

ANTHONY VALDEZ (6),

also known as "Colonel,"

JUAN FLORES (7),

also known as "Big Homie,"

[REDACTED]

LUIS MARQUEZ (10),

[REDACTED]

DANIEL RODRIGUEZ (13),

[REDACTED]

NELSON OCHOA (17),

[REDACTED]

ADAM RODRIGUEZ (21),

also known as "Messy,"

SA 19 CR 0370
XR

COUNT 1: Title 21, U.S.C. §§ 846, 841(a)(1) & 841(b)(1): Conspiracy to Possess with intent to Distribute (Methamphetamine)

COUNT 2: Title 21, U.S.C. §§ 846, 841(a)(1) & 841(b)(1): Conspiracy to Possess with intent to Distribute (Heroin)

COUNTS 3, 6, 8, and 10: Title 21, U.S.C. §§ 841(a)(1) & 841(b)(1)(C), 18 U.S.C. § 2: Possession with intent to Distribute (Heroin), and Aiding and Abetting

COUNTS 4, 5, 11, and 19: Title 21, U.S.C. §§ 841(a)(1) & 841(b)(1)(B), 18 U.S.C. § 2: Possession with intent to Distribute (Heroin), and Aiding and Abetting

COUNTS 7, 9, 12, 15, 20, 21: Title 21, U.S.C. §§ 841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2: Possession with intent to Distribute (Methamphetamine), and Aiding and Abetting

COUNTS 13, 16, and 18: Title 21, U.S.C. §§ 841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2: Possession with intent to Distribute (Heroin), and Aiding and Abetting

COUNT 14: Title 21, U.S.C. §§ 841(a)(1) & 841(b)(1)(C), 18 U.S.C. § 2: Possession with intent to Distribute (Methamphetamine), and Aiding and Abetting

COUNT 17: Title 21, U.S.C. §§ 841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2: Possession with intent to Distribute (Fentanyl), and Aiding and Abetting

CLARISELA BERMEA (5),
also known as "Mom,"
ANTHONY VALDEZ (6),
also known as "Colonel,"
JUAN FLORES (7),

NELSON OCHOA (17),
 [REDACTED]
 [REDACTED]
 [REDACTED]

ADAM RODRIGUEZ (21),
 also known as "Messy,"
 [REDACTED]
 [REDACTED]

JUAN SILVAS (24),
 also known as "Big Time,"
 ASHLEY GARZA (25),
 [REDACTED]
 [REDACTED]
 [REDACTED]

knowingly and intentionally conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a detectable amount of methamphetamine involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
[REDACTED]	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	50 grams or more of methamphetamine
[REDACTED]	50 grams or more of methamphetamine

[REDACTED]	50 grams or more of methamphetamine
CLARISELA BERMEA (5)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
ANTHONY VALDEZ (6)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	50 grams of methamphetamine
[REDACTED]	a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
NELSON OCHOA (17)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	50 grams or more of methamphetamine
ADAM RODRIGUEZ (21)	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	50 grams or more of a mixture or substance containing a detectable amount of methamphetamine
JUAN SILVAS (24)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine

ASHLEY GARZA (25)	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine
[REDACTED]	500 grams or more of a mixture or substance containing a detectable amount of methamphetamine

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)]

Beginning on or about May 2018, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

[REDACTED]

CLARISELA BERMEA (5),
also known as "Mom,"
ANTHONY VALDEZ (6),
also known as "Colonel,"
JUAN FLORES (7),
also known as "Big Homie,"

[REDACTED]

LUIS MARQUEZ (10),

[REDACTED]

DANIEL RODRIGUEZ (13),

[REDACTED]

[REDACTED]

ERICA LEE ZUNIGA (31),

knowingly and intentionally conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a detectable amount of heroin involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	100 grams or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED] [REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin

CLARISELA BERMEA (5)	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
ANTHONY VALDEZ (6)	100 grams or more of a mixture or substance containing a detectable amount of heroin
JUAN FLORES (7)	a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
LUIS MARQUEZ (10)	100 grams or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
DANIEL RODRIGUEZ (13)	100 grams or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	100 grams or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	a mixture or substance containing a detectable amount of heroin
[REDACTED]	100 grams or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	100 grams or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	1 kilogram or more of a mixture or substance containing a detectable amount of heroin

[REDACTED]	100 grams or more of a mixture or substance containing a detectable amount of heroin
ERICA ZUNIGA (31)	100 grams or more of a mixture or substance containing a detectable amount of heroin

All in violation of Title 21, United States Code, Section 846.

COUNT THREE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about May 31, 2018, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense a mixture or substance containing a detectable amount of heroin, a schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) and 18 U.S.C. § 2]

That on or about July 19, 2018, in the Western District of Texas, Defendants,

[REDACTED]
LUIS MARQUEZ (10),
 and
 [REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 18 U.S.C. § 2.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)]

That on or about July 31, 2018, in the Western District of Texas, Defendants,

[REDACTED]

did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT SIX

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about September 24, 2018, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about November 30, 2018, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about November 30, 2018, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT NINE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about January 16, 2019, in the Western District of Texas, Defendants,

[REDACTED]

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

COUNT TEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about January 16, 2019, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT ELEVEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) and 18 U.S.C. § 2]

That on or about February 6, 2019, in the Western District of Texas, Defendants,

[REDACTED]

CLARISELA BERMEA (5),
also known as "Mom,"

[REDACTED]

[REDACTED]
DANIEL RODRIGUEZ (13),
[REDACTED]
[REDACTED]
ERICA LEE ZUNIGA (31),

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 18 U.S.C. § 2.

COUNT TWELVE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 15, 2019, in the Western District of Texas, Defendants,

CLARISELA BERMEA (5),
also known as "Mom,"
JUAN SILVAS (24),
also known as "Big Time,"
ASHLEY GARZA (25),
[REDACTED]
[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

COUNT THIRTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,



aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT FOURTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,



aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a

Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(C) and 18 U.S.C. § 2.

COUNT FIFTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT SIXTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT SEVENTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 19, 2019, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 400 grams or more of a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (Fentanyl), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT EIGHTEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about February 23, 2019, in the Western District of Texas, Defendants,

[REDACTED]
CLARISELA BERMEA (5),
also known as "Mom,"
[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT NINETEEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) and 18 U.S.C. § 2]

That on or about March 6, 2019, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(B) and 18 U.S.C. § 2.

COUNT TWENTY

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about March 6, 2019, in the Western District of Texas, Defendants,

[REDACTED]

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

COUNT TWENTY-ONE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about April 9, 2019, in the Western District of Texas, Defendants,

[REDACTED]
NELSON OCHOA (17),
and
[REDACTED]

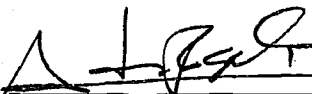
aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(A)(1)(A) and 18 U.S.C. § 2.

A TRUE BILL

FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:



ADRIÁN ROSALES
Assistant United States Attorney